



accompanying memorandum, a Protective Order should issue pursuant to Rule 26(c)(4) limiting the scope of these subpoenas as follows: 1) excluding documents relating exclusively to AstraZeneca PLC; 2) excluding documents relating exclusively to drugs that are not specifically identified in Appendix A to the AMCC; and 3) including only those documents that relate to the pricing or reimbursement of the AstraZeneca drugs identified on Appendix A to the AMCC .

Respectfully submitted,

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Dated: August 20, 2004

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was delivered to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, by sending on August 20, 2004, a copy to Verilaw Technologies for posting and notification to all parties.

/s/ Lucy Fowler  
Lucy Fowler

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1**

Pursuant to Local Rule 7.1(A)(2), the undersigned certifies that counsel for defendants conferred with counsel for plaintiffs on this motion, and attempted in good faith to resolve or narrow the issue.

/s/ Lucy Fowler  
Lucy Fowler